

EXHIBIT 6

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Chapter 11

Case No.: 12-12020 (MG)

Jointly Administered

**DECLARATION OF DAN FLANIGAN
IN SUPPORT OF KESSLER PLAINTIFFS' COUNSEL'S MOTION FOR AN AWARD
OF ATTORNEY'S FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

Dan Flanigan, pursuant to 28 U.S.C. §1746, hereby declares as follows in support of the
“**Motion**” referenced in the above caption:

1. I am an attorney with the law firm of **POLSINELLI PC** with offices in, among
other places, Kansas City, Wilmington, and New York.

2. I have been admitted to practice law in the following states—Missouri (1975) and
New York (2004)--and in various federal courts including the Western District of Missouri,
Southern District of New York, and Eastern District of New York.

3. I submit this declaration in support of Kessler Plaintiffs' Counsel's Motion for an
Award of Attorney's Fees and Reimbursement of Expenses.

4. My firm was retained to assist in the representation of the CBNV and GNBT
borrowers against RFC before this Court. My firm's representation of the Kessler Class
Members began after May 14, 2012 in this bankruptcy proceeding.

5. Set forth below on an hourly basis are my firm's legal services rendered on behalf
of Kessler Class Members in this case, the lodestar value of those services and the expenses

reasonably incurred by me/my firm in connection with this case for which we are requesting reimbursement.

6. The schedule attached is a summary indicating the amount of time spent by the partners, associate attorneys, and paralegals of my firm who were involved in this case and the lodestar calculations based on my firm's current rates for matters of this type. All the work was done by my firm was completed by attorneys and paralegals of the firm. *See Exhibit 1.*

7. As set forth in Exhibit 1, the total number of hours expended on this matter by my firm since May 14, 2012 through September 30, 2013 is 1,449 hours. Based on the listed hourly rates for each timekeeper, the total lodestar through that period of time is \$689,205.25.

8. The hourly rates used for the partners, associate attorneys and professional support staff of my firm included in Exhibit 1 are reasonable.

9. My firm's lodestar figures do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's above referenced rates. *See Exhibit 2.*

10. As detailed and categorized in Exhibit 2, my firm has incurred a total of \$11,509.79 in expenses in connection with this matter since May 14, 2012 through September 30, 2013 in the bankruptcy proceedings.

11. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 2, 2013

A handwritten signature in black ink, reading "Dan Flanigan". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Dan Flanigan

EXHIBIT 1

Polsinelli Time Keeper	HOURS	RATES	RATE X Hours
Shareholder			
Daniel J. Flanigan	989.75	575.00	569106.25
James E. Bird	28.35	440.00	12474.00
William J. Sanders	5.5	450.00	2475.00
Brett D. Anders	0.2	400.00	80.00
Chris A. Ward	6.7	500.00	3350.00
Jay L. Switzer Jr.	0.4	450.00	180.00
Cary Hall	1.2	390.00	468.00
Jason A. Nagi	42.9	375.00	16087.50
Edward M. Fox	0.5	750.00	375.00
Andrew J. Nazar	24.55	280.00	6874.00
Aaron C. Jackson	2.8	280.00	784.00
Angela S. Taylor	4.4	270.00	1188.00
Associates			
Wesley D. Ray	2.5	280.00	700.00
Shanti M. Katona	3.6	300.00	1080.00
Justin K. Edelson	7.5	320.00	2400.00
Daniel S. Dooley	3.4	260.00	884.00
Lauren A. Crawford	15.2	240.00	3648.00
Jarrett K. Vine	157.45	285.00	44873.25
A.C. Stanley	14.7	220.00	3234.00
Erik R. Edwards	6.8	350.00	2380.00
Subtotal	1318.4		672641.00
PARALEGALS			
Trists Backus	117.85	125.00	14731.25
Lindsey M. Suprum	2.7	195.00	526.50
Kimberlee A. Vervoort	10.05	130.00	1306.50
Subtotal	130.6		16564.25
TOTAL	1449		689205.25

EXHIBIT 2

**TO THE DECLARATION OF DANIEL J. FLANIGAN
IN SUPPORT OF KESSLER PLAINTIFFS' COUNSEL'S MOTION FOR AN AWARD
OF ATTORNEY'S FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

CATEGORIES	EXPENSES
Court Reporter/Filing Fees	\$600.00
Expert /Legal Services	0.00
Online Research/Reference Materials	\$7,091.58
Mail/Print/Copy/Scanning/Phone Services	\$2,672.80
Travel/Meeting Expenses	\$145.41
TOTAL EXPENSES	\$11,509.79